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November 18, 2024

By ECF

The Honorable Gabriel W. Gorenstein
U.S. District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

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Re: ***Naula Ndugga et al. v. Bloomberg L.P.*,
Civil Action No. 20-cv-07464 (GHW) (GWG)**

Dear Judge Gorenstein:

We represent Defendant Bloomberg L.P. (“BLP”) in the above-referenced matter. Pursuant to Section 2(A) of Your Honor’s Individual Rules of Practice in Civil Cases and the Amended Referral Order dated November 18, 2024 (Dkt. 319), BLP respectfully submits this letter to provide its position with respect to Plaintiff’s November 14, 2024 letter requesting a pre-motion conference in connection with her anticipated motion for class certification (Dkt. 317, re-filed as Dkt. 320).

While BLP maintains that Plaintiff will not be able to satisfy the rigorous requirements for certification of a class under Fed. R. Civ. P. 23, we do not object to Plaintiff’s request to file such a motion, and will save BLP’s substantive arguments regarding why class certification should be denied for its opposition brief.

BLP will consent to Plaintiff’s request for an extension of pages (to 35) for her moving brief and (to 15) for her reply brief, and respectfully requests a corresponding enlargement of its opposition brief to 35 pages.

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

cc: All Counsel of Record (*via ECF*)